

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

ST. CLAIR INTELLECTUAL
PROPERTY CONSULTANTS, INC.,

Plaintiff,

v.

GOOGLE INC.,

Defendant.

Civil Action No. 10-077-JJF-LPS

JURY TRIAL DEMANDED

STIPULATION TO STAY ACTION

WHEREAS, Plaintiff St. Clair Intellectual Property Consultants, Inc. (“St. Clair”) filed its Complaint for Patent Infringement against Defendant Google Inc. (“Google”) on January 29, 2010;

WHEREAS, at the time the above-captioned matter was filed, St. Clair identified the related actions styled as follows:

- a. *St. Clair Intellectual Property Consultants, Inc. v. Samsung Electronics Co., et al.*, C.A. No. 04-1436-JJF-LPS (D. Del.) (the “*Samsung* related action”);
- b. *St. Clair Intellectual Property Consultants, Inc. v. Siemens AG, et al.*, C.A. No. 06-403-JJF-LPS (D. Del.) (the “*Siemens* related action”);
- c. *St. Clair Intellectual Property Consultants, Inc. v. LG Electronics Inc., et al.*, C.A. No. 06-404-JJF-LPS (D. Del.) (the “*LG* related action”);
- d. *St. Clair Intellectual Property Consultants, Inc. v. Research In Motion LTD., et al.*, C.A. No. 08-371-JJF-LPS (D. Del.) (the “*RIM* related action”); and

- e. *St. Clair Intellectual Property Consultants, Inc. v. Fujifilm Holdings Corp., et al.*,
C.A. No. 08-373-JJF-LPS (D. Del.) (the “*Fujifilm* related action”); and

WHEREAS, the *Samsung*, *Siemens*, *LG*, *RIM*, and *Fujifilm* related actions have been stayed by the Court pending the outcome of the *St. Clair v. Fujifilm* appeal in the Federal Circuit Court of Appeals (Case Nos. 2009-1052, 2010-1137, -1140) (“*St. Clair v. Fujifilm* appeal”). (See C.A. No. 04-1436-JJF-LPS, D.I. 1031, 1038; C.A. No. 06-403-JJF-LPS, D.I. 419, 420; C.A. No. 06-404-JJF-LPS, D.I. 736, 742; C.A. No. 08-371-JJF-LPS, D.I. 456, 460; and C.A. No. 08-373-JJF-LPS, D.I. 331, 335); and

WHEREAS, in light of the stays in the *Samsung*, *Siemens*, *LG*, *RIM*, and *Fujifilm* related actions, St. Clair and Google have agreed to stay the above-captioned matter pending a decision in the *St. Clair v. Fujifilm* appeal;

NOW, THEREFORE, IT IS HEREBY STIPULATED, by and between the undersigned counsel, subject to the Court’s approval, that:

1. The above-captioned matter will be stayed until the Federal Circuit issues a decision in the *St. Clair v. Fujifilm* appeal.

2. The parties shall advise the Court within ten (10) days of the issuance of a decision from the Federal Circuit on the pending *St. Clair v. Fujifilm* appeal of the parties’ views as to the impact of that decision on the matters pending in the above-captioned matter.

SEITZ, VAN OGTROP & GREEN, P.A.

/s/ Patricia P. McGonigle

George H. Seitz, III (No. 667)
gseitz@svglaw.com
Patricia P. McGonigle (No. 3126)
pmcgonigle@svglaw.com
SEITZ, VAN OGTROP & GREEN
222 Delaware Avenue, Suite 1500
P.O. Box 68
Wilmington, DE 19899
(302) 888-0600

Of Counsel:

Ronald J. Schutz, Esq.
Jake M. Holdreith, Esq.
Becky R. Thorson, Esq.
Carrie M. Lambert, Esq.
Annie Huang, Esq.
Seth A. Northrop, Esq.
ROBINS, KAPLAN, MILLER & CIRESI L.L.P.
2800 LaSalle Plaza
800 LaSalle Avenue
Minneapolis, MN 55402
(612) 349-8500

*Attorneys for Plaintiff St. Clair Intellectual
Property Consultants, Inc.*

Dated: July 27, 2010

CONNOLLY BOVE LODGE & HUTZ LLP

/s/ Arthur G. Connolly, III

Arthur G. Connolly, III (No. 2667)
aconnollyiii@cblh.com
CONNOLLY BOVE LODGE & HUTZ LLP
1007 North Orange Street
P.O. Box 2207
Wilmington, DE 19899
(302) 658-9141

Of Counsel:

Ramsey M. Al-Salam, Esq.
PERKINS COIE LLP
1201 Third Ave., Suite 4800
Seattle, WA 98101
(206) 359-8000

Attorneys for Defendant Google Inc.

Dated: July 27, 2010

SO ORDERED this _____ day of _____, 2010.

United States Magistrate Judge